

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

ANDREW F. DAWSON (CABN 264421)
ROSS WEINGARTEN (NYBN 5236401)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7019
FAX: (415) 436-7234
andrew.dawson@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 20-249 RS
)	
Plaintiff,)	DECLARATION OF ANDREW F. DAWSON IN
)	SUPPORT OF OPPOSITION TO MOTION TO
v.)	COMPEL
)	
MARCUS ANDRADE,)	
)	
Defendant.)	

Andrew F. Dawson, counsel for the United States, states as follows:

1. I am counsel for the government in this matter.
2. Attached as Exhibit A is a true and correct copy of a letter, dated May 19, 2020, received by the U.S. Attorney's Office from Defendant Andrade.
3. Attached as Exhibit B is a true and correct copy of a pleading filed by Defendant Andrade in a related civil forfeiture matter (Case No. 4:20-cv02013-KAW), which was downloaded from the Court's ECF system.
4. Attached as Exhibit C is a true and correct copy of a letter sent by the U.S. Attorney's Office to Defendant Andrade on August 1, 2022.

5. I have been informed that on December 1 and 2, 2022, FBI agents were able to speak with Angela Generosa by telephone. Ms. Generosa told the agents that she had never spoken with any representative of the FBI about Andrade or the investigation into him until December 2022.

6. Ms. Generosa told the agents that it was not true that Comply Advantage, a company she had previously worked for, monitored AML Bitcoin transactions during her tenure assigned to Andrade's account. She stated that Comply Advantage did not monitor any transactions for Andrade's company while she worked on the account, and that she had never heard of the name "AML Bitcoin" until being interviewed in December 2022.

7. Ms. Generosa stated that Comply Advantage was never able to deliver a functional product to Andrade while she worked on the project and that Andrade had a contract with Comply Advantage that was never fulfilled. She further stated that Andrade broke his contract in less than six months, and she suspects he did not pay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 5, 2022, at San Francisco, California.

/s/ _____
ANDREW F. DAWSON
Assistant United States Attorney